

# EXHIBIT H

ORAL DEPOSITION OF RENEE BECKHAM, produced as a witness at the instance of the Plaintiffs and duly sworn, was taken in the above styled and numbered cause on Thursday, February 13, 2025, from 9:10 a.m. to 2:49 p.m., before DONNA QUALLS, Notary Public in and for the State of Texas, Notary ID No. 12161359, reported by computerized stenotype machine, at the offices of Houston City Hall Annex, 900 Bagby Street, 4th Floor, Houston, Texas, pursuant to the Federal Rules of Civil Procedure, and any provisions stated on the record or attached hereto.

A P P E A R A N C E S

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Renee Beckham

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Pages 154 to 157

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| <p style="text-align: right;">Page 154</p> <p>1 A. One ongoing. I think I mentioned Loaves &amp;<br/>2 Fishes earlier.<br/>3 Q. Okay.<br/>4 A. In their -- I guess in their patio, we got a<br/>5 complaint. The weekend inspector went out there, and<br/>6 they were -- the organization -- I don't remember the<br/>7 name of the organization. They weren't feeding them in<br/>8 accordance with food safety. So there was issues with<br/>9 the manner of which the food was being provided or<br/>10 uncovered food. So you're serving buffet style, and you<br/>11 have food just totally exposed.<br/>12 Q. And when you -- so was it -- do you know if<br/>13 Loaves &amp; Fishes authorizes other groups to provide<br/>14 charitable feedings on their patio?<br/>15 A. This was the first that I had heard --<br/>16 Q. Okay.<br/>17 A. -- that they even had charitable feeding on<br/>18 their property because they have a kitchen. But I think<br/>19 on Sundays or Sunday mornings they don't feed. So<br/>20 that's probably why they do that.<br/>21 Q. And Loaves &amp; Fishes itself provides meals to<br/>22 homeless people during the week, right?<br/>23 A. Yes.<br/>24 Q. But it provides those meals on their own<br/>25 property?</p> | <p style="text-align: right;">Page 156</p> <p>1 illegal food establishment. So I would have to go<br/>2 through the database and look by the address whether<br/>3 they're referring to someone feeding the homeless or<br/>4 not. See what I'm saying?<br/>5 Q. Okay. So -- but aside from the three<br/>6 complaints -- the 2018, the 2020 -- the 2018 across the<br/>7 street from Loaves &amp; Fishes, 2020 outside the Central<br/>8 Library, and the current issue at Loaves &amp; Fishes -- are<br/>9 you aware or have you seen any other food safety<br/>10 complaints arising out of charitable feeding?<br/>11 A. No. Just those that, like I say, that I'm<br/>12 aware of.<br/>13 Q. Okay. Now, do employees from the health<br/>14 department regularly attend feedings at 61 Riesner?<br/>15 A. No, they don't. It's not a regular, routine<br/>16 site that they would visit.<br/>17 Q. Okay. And earlier you mentioned that you<br/>18 maintain a calendar of the groups and individuals who<br/>19 are feeding at 61 Riesner; is that right?<br/>20 A. Yes.<br/>21 Q. And do people have to schedule a charitable<br/>22 feeding on the calendar to feed there, or can they just<br/>23 show up and provide food?<br/>24 A. They could just show up.<br/>25 Q. Okay.</p> |
| <p style="text-align: right;">Page 155</p> <p>1 A. Right.<br/>2 Q. So it's not covered by the ordinance?<br/>3 A. It's covered by Chapter 20, yes, because it's a<br/>4 permitted kitchen.<br/>5 Q. Okay.<br/>6 A. Right.<br/>7 Q. But it's not covered by the charitable feeding<br/>8 ordinance because they're doing the feeding on their own<br/>9 property?<br/>10 A. Right.<br/>11 Q. Okay. Now -- okay. So now we have three.<br/>12 There's the 2018 complaint across the street from<br/>13 Loaves &amp; Fishes, the 2020 complaint outside the Central<br/>14 Library --<br/>15 A. Right.<br/>16 Q. -- and then the ongoing complaint about another<br/>17 group serving feed in Loaves &amp; Fishes' patio.<br/>18 A. Yes.<br/>19 Q. Aside from those complaints, are there any<br/>20 other current complaints about the food safety or<br/>21 sanitation for charitable feeding?<br/>22 A. There could be. And the reason I'm saying this<br/>23 is because they're going to be listed, it depends on how<br/>24 the person describes the complaint to us. So anyone<br/>25 that doesn't have a permit, we're going to call it an</p>   | <p style="text-align: right;">Page 157</p> <p>1 A. Yeah, I would say, yes, they can just show up.<br/>2 Q. Okay. So it's an optional step to get in<br/>3 contact with the health department to schedule it and<br/>4 put it on the calendar?<br/>5 A. Right.<br/>6 Q. Okay. I'm going to hand you what I've marked<br/>7 as Exhibit 46.<br/>8 (Exhibit No. 46 was marked.)<br/>9 Q. (BY MR. HIROSHIGE) Take a moment to review<br/>10 these pages.<br/>11 A. (Witness complies.)<br/>12 Okay.<br/>13 Q. And so this is the calendar for charitable food<br/>14 service events on the health department's web page,<br/>15 right?<br/>16 A. Yes.<br/>17 Q. And it lists some of the individuals and groups<br/>18 providing food at 61 Riesner?<br/>19 A. Yes.<br/>20 Q. Okay. Now, on this first page -- and so do you<br/>21 see on the top where it says January 2025?<br/>22 A. Yes.<br/>23 Q. Okay. So it appears that someone named<br/>24 Elizabeth Tannery scheduled a charitable feeding at<br/>25 Riesner on January 1st, 2025?</p>  |

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REPORTER'S CERTIFICATION  
ORAL DEPOSITION OF  
RENEE BECKHAM  
TAKEN FEBRUARY 13, 2025

I, DONNA QUALLS, Shorthand Reporter and Notary  
Public in and for the State of Texas, Notary ID  
No. 12161359, hereby certify to the following:

That the witness, RENEE BECKHAM, was duly  
sworn by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;

That the original deposition was delivered to  
RANDALL HIROSHIGE;

That a copy of this certificate was served on  
all parties and/or the witness shown herein on

\_\_\_\_\_.

I further certify that pursuant to FRCP No.  
30(f)(i) that the signature of the deponent was  
requested by the deponent or a party before the  
completion of the deposition and that the signature is  
to be returned within 30 days from date of receipt of  
the transcript. If returned, the attached Changes and  
Signature Page contains any changes and the reasons  
therefor.

I further certify that I am neither counsel

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1 for, related to, nor employed by any of the parties in  
2 the action in which this proceeding was taken, and  
3 further that I am not financially or otherwise  
4 interested in the outcome of the action.

5 Certified to by me this 28th day of February,  
6 2025.

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10 DONNA QUALLS  
11 Notary Public in and for  
12 The State of Texas, Notary ID 12161359  
13 My Commission expires 11/06/2026

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